

## The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

NO. CR23-165-JCC

Plaintiff,

**PROTECTIVE ORDER  
[PROPOSED]**

## ROBERT "BO" NNANWUBAS,

## Defendant

1. Defendant Robert “Bo” Nnanwubas made his initial appearance on November 30, 2023, and was ordered detained pending trial for this matter.

2. This Protective Order governs all discovery material in any format (written or electronic) that is produced by the government in discovery in the above-captioned.

**3. Protected Material.** Discovery in this case is voluminous. Many of these materials and documents include personally identifiable information (PII), which is defined for purposes of this order as Social Security numbers, driver's license numbers, dates of birth, addresses), and bank or other financial account numbers. Redacting the discovery to delete PII would unnecessarily delay the disclosure of discovery to the defendant and would frustrate the intent of the discovery process. For the purposes of this order, the materials described in paragraph 2 are collectively, "Protected Material."

1       4. **Designations.** The government shall mark materials containing PII from  
 2 financial institutions, payment platforms, electronic service providers, and other third  
 3 parties as “Protected Material.”

4       5. **Defense Team.** For the purposes of this order, “Defense Team” shall be  
 5 limited to attorneys of record for the defendant and any of the following people working  
 6 on this matter under the supervision of the attorneys of record: attorneys, investigators,  
 7 paralegals, law clerks, testifying and consulting experts, and legal assistants. For  
 8 purposes of this Order, “Defense Team” does not include the defendant. Defendant’s  
 9 attorneys shall inform any member of the Defense Team to whom disclosure of discovery  
 10 material is made of the existence and terms of this Protective Order. Members of the  
 11 Defense Team shall not provide copies of any discovery material marked “Protected  
 12 Material” to any persons outside of the Defense Team, except as specifically set forth  
 13 below.

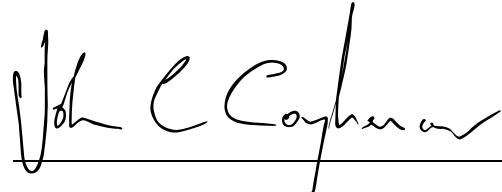
14       6. **Restricted Access.** Members of the Defense Team shall retain custody of  
 15 all copies of the Protected Material, except as discussed below in paragraph 7. Members  
 16 of the Defense Team shall use Protected Material only for the purpose of preparing a  
 17 defense to the charges in this action. Members of the Defense Team may review the  
 18 Protected Material with the defendant and witnesses for purposes of trial preparation,  
 19 provided that witnesses may review the Protected Material only in the presence a member  
 20 of the Defense Team and may not take notes regarding the content of the Protected  
 21 Material.

22       7. While held at the Federal Detention Center (FDC), the defendant will be  
 23 permitted to review the Protected Material, consistent with the regulations established by  
 24 the BOP and with his counsel in a controlled environment at the FDC, but will be  
 25 prohibited from printing out, copying, or disseminating the Protected Material.  
 26 Defendant is prohibited from maintaining a copy of the Protected Material or any notes  
 27 made while reviewing that material, in his cell.

1       8. Any discovery material containing personal identifying information or  
2 personal financial information that the Defense Team files with the Court in connection  
3 with pre-trial motions, trial, or other matters before the Court, shall either be redacted to  
4 remove the personal identifying information or personal financial information, or shall be  
5 filed under seal and shall remain sealed until otherwise ordered by the Court.

6       9. This Protective Order may be modified, as necessary, by filing with the  
7 Court a Stipulated Order Modifying the Protective Order or by order of the Court.  
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9                     DATED this 6th day of December 2023.  
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15                     JOHN C. COUGHENOUR  
16                     United States District Court Judge  
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Presented by:  
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19                     /s/ Cindy Chang  
20                     CINDY CHANG  
21                     Assistant United States Attorney  
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